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September 4, 2025

Via ECF

Hon. Steven L. Tiscione
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Olaechea v. Brentwood Union Free School District
Docket No. 24-cv-0593 (JMA)(ST)

Dear Judge Tiscione:

This firm is the outgoing counsel of record for Plaintiff Desiree Olaechea in the above-captioned action. I am writing to request a one-day extension of time for filing of our firm's application for a retaining and charging lien in response to Ms. Olaechea's termination of our firm's representation. The filing was made this morning prior to this application, and it is respectfully requested that it be deemed timely filed *nun pro tunc*. While the papers were completed yesterday evening, due to the undersigned's inadvertent error, they were not uploaded and served at the same time. As soon as the error was realized the papers were immediately uploaded and served this morning. The undersigned apologizes for the brief delay, yet maintains that there is no prejudice to the parties, and thus now makes this request for the extension of time.

Thank you for your attention to this matter.

Sincerely,

STEWART LEE KARLIN
LAW GROUP, P.C.

/s/ Daniel Edward Dugan
Daniel Edward Dugan, Esq.

cc: Defendant's counsel (*Via EFC*)
Desiree Olaechea (*Via Email*)